

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**The City of Huntington,
Plaintiff,**

v.

**AmerisourceBergen Drug Corporation, et al.
Defendants.**

**Cabell County Commission,
Plaintiff,**

v.

**AmerisourceBergen Drug Corporation, et al.
Defendants.**

Civil Action No. 3:17-01362
Hon. David A. Faber

Civil Action No. 3:17-01665
Hon. David A. Faber

NOTICE OF REMOTE VIDEOTAPED DEPOSITION OF VICKIE CUNNINGHAM

PLEASE TAKE NOTICE that, pursuant to the applicable Federal Rules of Civil Procedure and the Deposition Protocol governing this litigation, Defendants, by and through undersigned counsel, will take the remote, oral, videotaped deposition of **Vickie Cunningham**, on **August 24, 2020**, beginning at **10:00 a.m. Eastern Standard Time**. Court reporting services and video recording services will be provided by Veritext Legal Solutions via alternative video teleconferencing (VTC) services (Zoom). Parties who wish to access the deposition by phone may dial in using conference call number **646-568-7788** and access code **8030287568**.

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court.

Dated: August 10, 2020

Respectfully submitted,

/s/ Jeffrey M. Wakefield

Jeffrey M. Wakefield (WVSB #3894)
jwakefield@flahertylegal.com
Jason L. Holliday (WVSB #12749)
jholliday@flahertylegal.com
FLAHERTY SENSABAUGH BONASSO PLLC
P.O. Box. 3843
Charleston, WV 25338-3843
Telephone: (304) 345-0200

/s/ Geoffrey E. Hobart

Geoffrey E. Hobart
Mark H. Lynch
Christian J. Pistilli
Laura Flahive Wu
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street NW Washington, DC 20001
Tel: (202) 662-5281
ghobart@cov.com
mlynch@cov.com
cpistilli@cov.com
lflahivewu@cov.com

Counsel for McKesson Corporation

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on 10th day of August, 2020, the forgoing was served using the Court's CM/ECF system, which will send notification of such filing to all counsel of record, and via electronic mail at mdl2804discovery@motleyrice.com and track2opioddefendants@reedsmit.com

Dated: August 10, 2020

/s/ Mark H. Lynch

Mark H. Lynch